

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE LITIGATION)	MDL No. 1456
)	
)	CIVIL ACTION: 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:)	
<i>State of Montana v. Abbott Labs Inc., et al.</i>)	Judge Patti B. Saris
02-CV-12084-PBS)	

**DEFENDANTS ABBOTT LABORATORIES, PFIZER INC., AND PHARMACIA
CORPORATION’S JOINDER IN JOINT RESPONSE TO STATE OF MONTANA’S
STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF ITS MOTION
FOR PARTIAL SUMMARY JUDGMENT AND INDIVIDUAL
SUPPLEMENTAL STATEMENT OF UNDISPUTED FACTS**

Defendants Abbott Laboratories (“Abbott”), Pfizer Inc. (“Pfizer”), and Pharmacia Corporation (“Pharmacia”) join in Defendants’ Joint Response to the State of Montana’s Statement of Undisputed Material Facts in Support of Its Motion for Partial Summary Judgment Against Certain Defendants and Supplemental Statement of Undisputed Facts and make the following Supplemental Statement of Undisputed Facts in support of its Individual Opposition to the State’s Motion for Partial Summary Judgment:

¶¶ 13 – 19. Abbott incorporates as if fully set forth herein, paragraphs 10, 17, 23, 28, and 30 – 32 of its Local Rule 56.1 Statement of Undisputed Material Facts in Support of Its Motion for Summary Judgment, and exhibits thereto (Docket No. 3785).

¶¶ 20 – 30. Pfizer and Pharmacia incorporate as if fully set forth herein, paragraphs 6 – 14, 30 – 31 of their Local Rule 56.1 Statement of Undisputed Material Facts in Support of Its Motion for Summary Judgment, and exhibits thereto (Docket No. 3770).

Dated: March 22, 2007

Respectfully submitted,

/s/ Toni-Ann Citera

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**Counsel for Pfizer Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2007, I caused a true and correct copy of the foregoing Defendants Abbott Laboratories, Pfizer, Inc., and Pharmacia Corporation's Joinder in Joint Response to State of Montana's Statement of Undisputed Facts in Support of its Motion for Partial Summary Judgment and Individual Supplemental Statement of Undisputed facts to be served on all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2 in MDL No. 1456, a copy to LexisNexis File and Serve for Posting and notification to all parties..

/s/ Toni A. Citera

Toni A. Citera